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October 13, 2017

BY ECF

Honorable Debra C. Freeman
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Lisa Snead v. City of New York, et al.,
16 Civ. 9528 (AJN)

Your Honor:

I am a Senior Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, representing defendants City of New York, retired Police Officer Gregory Lobianco and Sergeant Asa Barnes ("defendants") in connection with the above-referenced matter. On October 3, 2017, a phone conference was held before the Honorable Debra C. Freeman wherein the Court ordered defendants to produce, among other things, certain discovery at issues in this case by October 13, 2017. For the reason set forth below, defendants respectfully request a one-week extension of time, from October 13, 2017 to October 20, 2017, to provide a complete response to plaintiff. Plaintiff's counsel, Gabe Harvis, consents to this request, which is defendants' first request for an extension of time to comply with the October 3, 2017 Court Order.

During the October 3, 2017 phone conference, the Court instructed defendants to produce, among other things, the DAT Investigation Report, Prisoner Movement Slip, Central Booking Log and Overtime Records of the defendant officers or provide an affidavit of the search performed the records. Shortly after the phone conference, this office requested another expedited search for the aforementioned documents. On October 13, 2017, defendants provided plaintiffs with copies of the officers' overtime report; however, due to an unforeseen circumstance, defendants require additional time to produce the DAT Investigation Report,

Prisoner Movement Slip and the Central Booking Prisoner Log or an affidavit attesting to the search performed for these documents. In light of the foregoing, defendants respectfully request an extension of time until October 20, 2017 to produce the remaining documents or affidavit to plaintiff.

Defendants thank the Court for its consideration.

Respectfully submitted,

/s/

Nana K. Sarpong
Senior Counsel

VIA ECF:

Gabriel Harvis, Esq.